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October 1, 2009

Thomas J. Gawlik President & CEO ESI Environmental 5232 West 79th Street Indianapolis, IN 46268

Re: Storm Water Retention at West 86th Street Facility

MNA Commission No: 2009109

Dear Mr. Gawlik:

This letter documents available and recommended storm water retention capacity and sufficient freeboard for ESI's West 86th Street water treatment facility.

Given

- 1. Site storm water retention should provide sufficient freeboard to contain that quantity of precipitation falling on the site in a 24 hour event with average recurrence interval of 25 years. Source: "SPCC Guidance for Regional Inspectors" Version 1.0, dated 11/28/2005, paragraph 4.2.4.
- 2. Precipitation depth for a 24 hour event with average recurrence interval of 25 years is 4.8 inches. Source: City of Indianapolis "Storm Water Design Manual" Table 202-2.
- 3. A one inch precipitation event accumulates 156,990 gallons of water on ESI's site. Source: Schneider Corporation survey, Sheet C103 dated 10/01/2009.
- 4. The largest tank on ESI's site that relies on the existing curb surrounding the perimeter of the site for secondary containment is 21,000 gallons. Source: ESI drawing G2.02 "Equipment and Tankage Locations" Revision 3, dated 03/29/2006.
- 5. Storage volume inside existing curb surrounding the perimeter of the site is 227,856 gallons. Source: Schneider Corporation survey, Sheet C103 dated 10/01/2009.
- 6. Storage volume in underground storm piping and structures is 43,393 gallons. Source: Schneider Corporation survey, Sheet C103 dated 10/01/2009.
- 7. Maximum treatment rate of ESI's API separator and DAF unit is 700 gallons per minute. Source: Tenco Hydro, Inc. specifications for this equipment dated December 1992 and ESI operating methodology.

Assumption

1. Only 55% of the maximum capacity of the API separator and DAF unit is used for treatment of storm water. Allows capacity for on-going plant operation.

Thomas J. Gawlik ESI Environmental October 1, 2009 Page 2 of 2

Recommended Retention Capacity and Sufficient Freeboard

By Givens 1, 2, 3, and 4, the site should retain 774,552 gallons of water and oil. (156,990 * 4.80 + 21,000 = 774,552).

Available Retention Capacity

By Givens 5, 6, and 7 and Assumption 1, available retention capacity is 824,649 gallons (227,856 + 42,393 + 700 * 0.55 * 1440 = 824,649).

Conclusion

Our analysis indicates that available retention capacity exceeds recommended sufficient freeboard by 50,097 gallons.

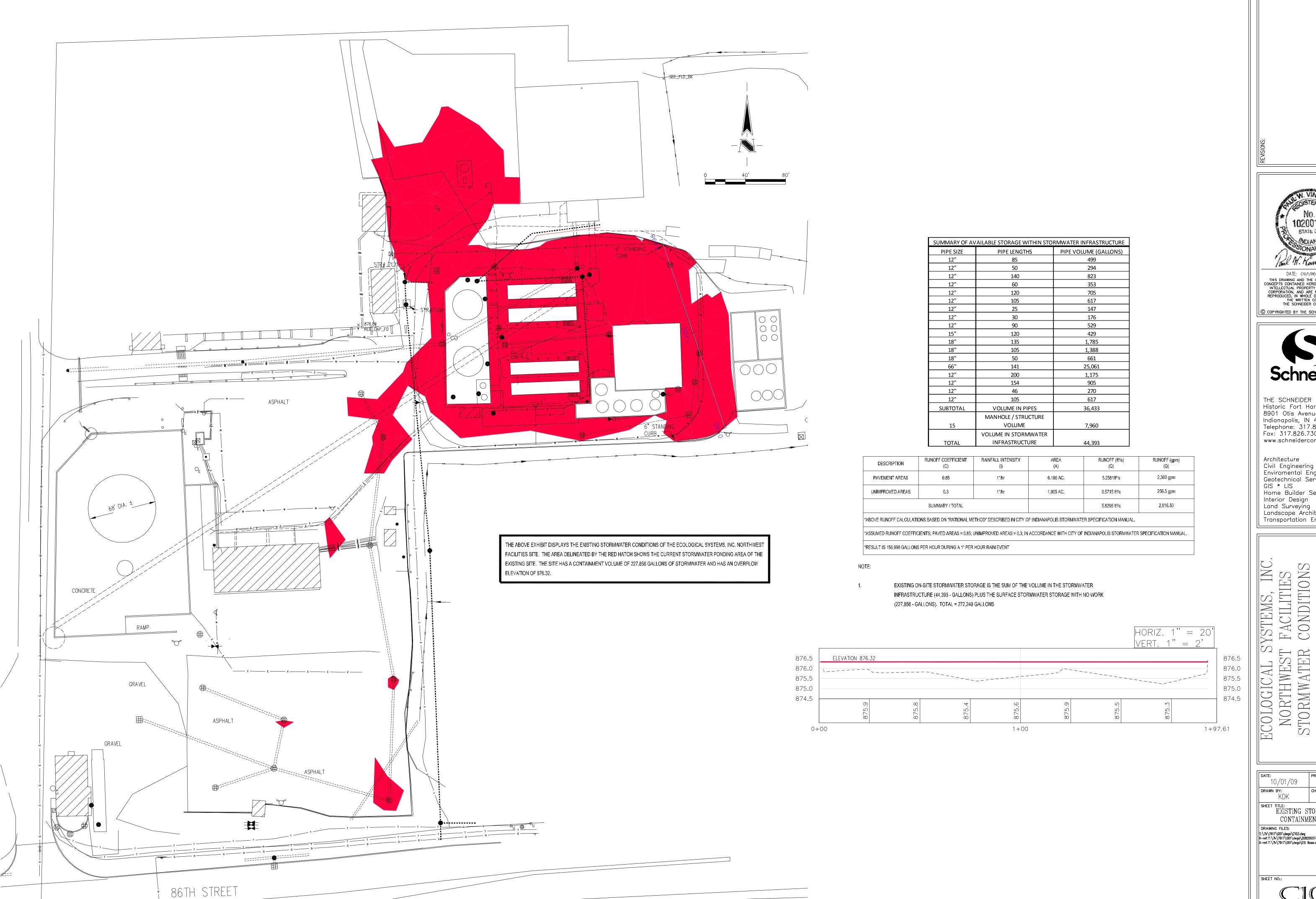
Sincerely,

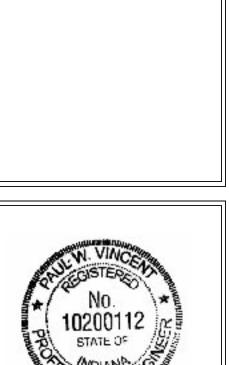
Mussett, Nicholas & Associates, Inc.

Bruce O. Conner, PE

President

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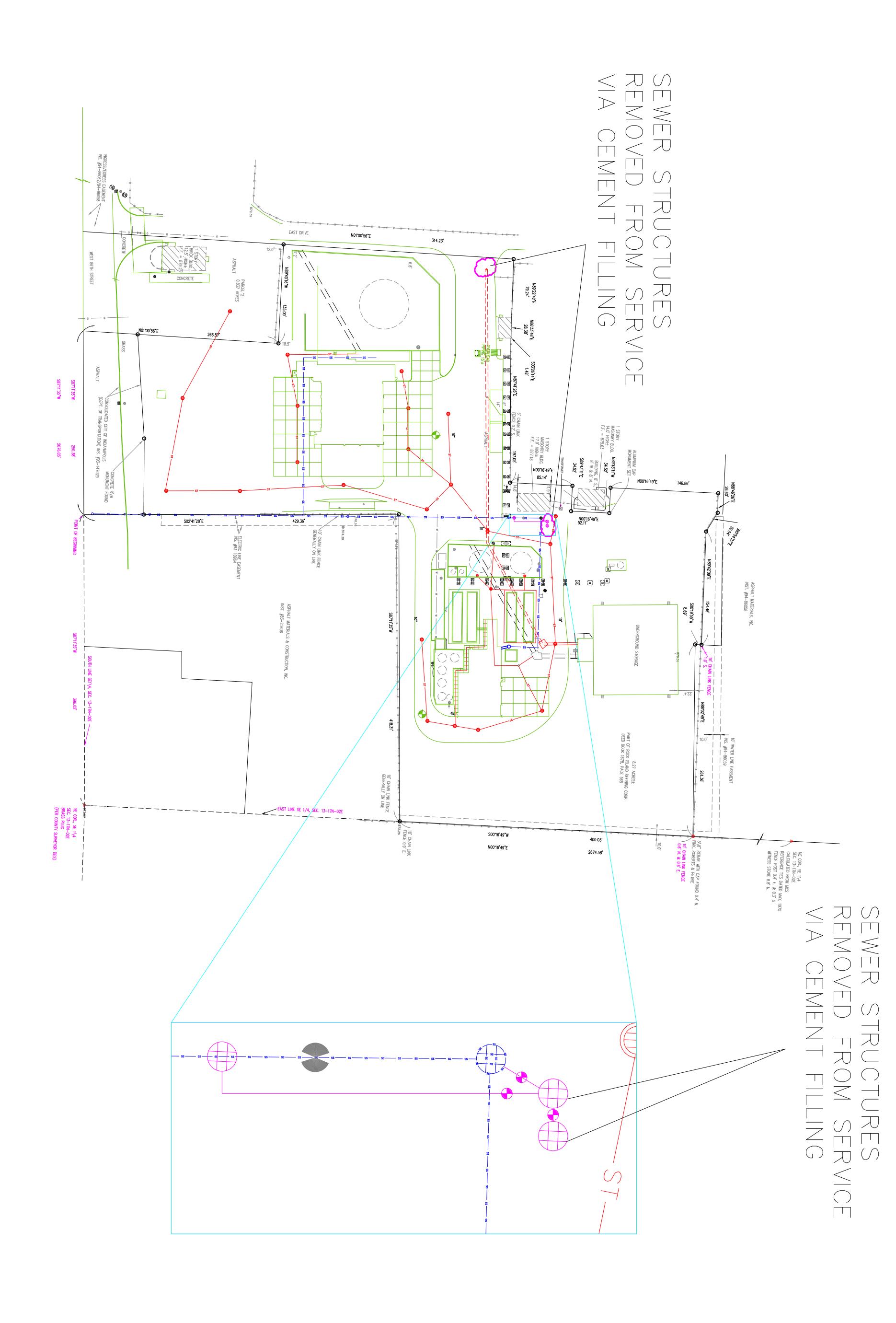
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DATE: 10/01/09	PROJECT NO.: 7617.001
DRAWN BY:	CHECKED BY:
SHEET TITLE: EXISTING STORMWATER	

CONTAINMENT AREA

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C103



Stormwater Discharge

ESI's facility is completely paved and bermed to collect all stormwater, including any associated with industrial activities. The stormwater is collected in a captive storm sewer that places the stormwater into the facility's wastewater storage tanks. The storm water mixes the CWT wastewater and is processed through the treatment system. The water is discharged to the City of Indianapolis sewer system to the POTW. ESI has an industrial pretreatment permit #49503. No stormwater associated with industrial activity leaves the facility; therefore there is no requirement for a stormwater discharge permit.